

Comments on proposed vessel security regulations on river towboats:

- 1) As was stated at the public meeting in St. Louis applying the same regulations with a broad brush to apply to the blue water, brown water line haul and brown water harbor industries is in fact counter productive due to the vast differences in the industries. Instead of using the industry as the Coast Guard's "eyes and ears" on the waterways you run the real risk of trivializing the whole concept of security to those segments saddled with non-productive regulations. For instance, if as currently written, the regulations require a VSO on each crew of a harbor towboat which normally runs non live aboard vessels with three 2 two man crews then the pilot will generally be the VSO. If the pilot is off for a day and a trip pilot is running the vessel he, as a new crewman cannot be a VSO so it is left to the deckhand. Now a security drill must be performed because 25% of the crew has changed since the last drill. An untrained and very possibly uneducated deckhand must now conduct a security drill. When the crews realize this the whole concept of Maritime Security will be taken as a joke and no coxing by management or the Coast Guard can overcome this perception. Along the same line what is a restricted area on a 2 man harbor vessel?
- 2) What type of security measures are appropriate when taking a barge from a line boat to a harbor boat/harbor boat to fleet?
- 3) On a 2 man harbor vessel what type of security drill is appropriate other than calling 911? A security drill in this situation should not be required as our harbor vessels have access to cell phones.
- 4) As stated, a security drill must be performed whenever 25% of the crew changes since the last drill. According to this regulation, a drill must be conducted on our vessels with a 2 man crew if a deckhand is replaced for a day.
- 5) Security records for harbor boats should be readily available but should not be maintained on the vessel for security of those records.
- 6) Page 79764, Federal Register/Vol 67, No250/Monday December 30, 2002 stated "Towing vessels will not have VSOs." VSOs on 2 man harbor towboats are impractical and will not enhance security.
- 7) Many river harbor crews do their jobs well but no members of some crews are capable of meeting the stated qualifications for VSO. The CSO should be allowed to be VSO for harbor services.
- 8) How is the company to assess the worst case scenario regarding barges and cargos?
- 9) A template for VSAs and VSPs is needed for each type of vessel, line haul, harbor and passenger.